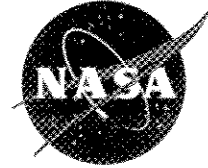


National Aeronautics and Space Administration

Headquarters
Washington, DC 20546-0001



February 25, 2010

General Law Practice Group

Reply to Attn of:

TO: Distribution

FROM: Alternate Designated Agency Ethics Official

SUBJECT: Determination Regarding Attendance by NASA Employees at the Coalition of EPSCoR/IDeA Reception and Dinner on March 2, 2010

On March 2, 2010, the Coalition of Experimental Program to Stimulate Competitive Research and Institutional Development Award (EPSCoR/IDeA) States, a non-profit organization under 501(c)(4), will host a reception and dinner at the Liaison Capitol Hill Hotel, in Washington, D. C., from 6:00p.m.-9:00 p.m.

The reception and dinner will be attended by senior leaders of the aerospace industry, trade associations, academia, Congressional staff, and other Federal agencies. Approximately 100 people have been invited and are expected to attend. The estimated cost of the reception and dinner, which includes all food and beverages, is \$100.00 per person. I find that the event meets the requirements of a "widely attended gathering" as defined in 5 C.F.R. § 2635.204(g).

I further determine that there is an Agency interest in having NASA personnel attend the event because it will further Agency programs or operations. Attendance at the reception and dinner will allow NASA representatives the opportunity to discuss NASA's programs and plans with other guests. Accordingly, NASA employees whose duties do not substantially affect the event sponsor, or a majority or all of its members, may accept an invitation for free attendance to the reception and dinner for themselves and their accompanying guests.

However, NASA employees who are in non-career positions in which Executive Order 13490, requires signing an ethics pledge, may only attend if they reimburse the sponsors the cost of the reception for themselves and accompany guests. Moreover, NASA employees whose duties substantially affect the event sponsors, such as by way of procurement duties, should seek an individual determination pursuant to 5 C.F.R. § 2635.205(g)(3)(1) regarding participation in this event from their local ethics counselor.

A handwritten signature in black ink, appearing to read "Adam F. Greenstone", written over a horizontal line.

Adam F. Greenstone